

CERTAIN & ZILBERG, PLLC
909 THIRD AVENUE FIFTH, 28TH FLOOR
NEW YORK, NEW YORK 10022
TEL. 212.687.7800
FAX 212.687.7801

Writer's Extension: x222
Writer's Email: mzilberg@certainlaw.com

March 19, 2012

VIA ECF

Honorable Sterling Johnson, Jr.
United States District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States of America v. Lyubov Groysman
10 CR 459 (SJ)

Dear Judge Johnson:

This firm represents Ms. Lyubov Groysman, the defendant in this matter. This letter is being respectfully submitted as a request for this Court to modify Ms. Groysman's home confinement.

As per the Court's Order of March 16, 2012, wherein the Court denied our request to set aside or modify Ms. Groysman's home confinement, without prejudice, and further directed us to discuss the matter with probation, I reached out to U.S. Pretrial Services Officer Michael Ilaria, who is in charge of Ms. Groysman's case. Having discussed Ms. Groysman's case with the U.S. Pretrial Services Officer to whom Ms. Groysman reported prior to her conviction and having reviewed our proposed schedule (ECF Document No. 282), Officer Ilaria recommended that a curfew schedule be established for Ms. Groysman, requiring home confinement between the hours of 9:00 p.m. and 7:00 a.m., thereby permitting Ms. Groysman to leave the home in order to tend to her personal responsibilities and elderly mother between the hours of 7:00 a.m. and 9:00 p.m.

We respectfully request that the Court confirm the above referenced curfew schedule for Ms. Groysman.

We thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael Zilberg', with a stylized, cursive script.

Michael Zilberg [MZ-5250]

To: AUSA Karen Hennigan
(Via email)